1	LIPSON, NEILSON, COLE, SELTZER & GARIN, P.C.
2	Kaleb D. Anderson, Esq.
	Nevada Bar No. 7582
3	Amber M. Williams, Esq.
	Nevada Bar No. Bar No. 12301
4	9900 Covington Cross Drive, Suite 120
	Las Vegas, Nevada 89144
5	Phone: (702) 382-1500
,	Fax: (702) 382-1512
3	kanderson@lipsonneilson.com
7	awilliams@lipsonneilson.com
3	Attorneys for Defendant
	Woodchase Condominiums Homeowners Association

### **UNITED STATES DISTRICT COURT**

#### **DISTRICT OF NEVADA**

BANK OF AMERICA, N.A.,

Plaintiff,

VS.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

WOODCHASE CONDOMINIUMS HOMEOWNERS ASSOCIATION; HAMPTON & HAMPTON COLLECTIONS LLC,

Defendants.

CASE NO.: 3:17-cv-00462-MMD-VPC

STIPULATION & ORDER TO EXTEND TIME TO FILE RESPONSE TO BANK OF AMERICA, N.A.'S COMPLAINT

(Third Request)

Plaintiff BANK OF AMERICA, N.A. ("Plaintiff") and Defendant WOODCHASE CONDOMINIUMS HOMEOWNERS ASSOCIATION ("HOA"), by and through their respective counsel, hereby agree and stipulate as follows:

IT IS HEREBY AGREED AND STIPULATED, that the deadline for the HOA to file a Response to Plaintiff's Complaint [ECF No. 1], which Plaintiff filed on August 2, 2017, shall be extended an additional sixty (60) days.

The parties previously agreed to extend the deadline until December 22, 2017 pursuant to a Stipulation to Extend (Second Request) that was filed on October 18, 2017 [ECF No. 14], which the Court granted on October 20, 2017 [ECF No. 15].

## Case 3:17-cv-00462-MMD-VPC Document 16 Filed 12/21/17 Page 2 of 2

(702) 382-1500 - fax (702) 382-1512

Las Vegas, Nevada 89144

Lipson, Neilson, Cole, Seltzer & Garin, P.C. 9900 Covington Cross Drive, Suite 120 1

2

3

4

5

6

7

The response is currently due on December 22, 2017 and the new deadline will be February 22, 2018. This is the Third stipulation for extension of time to file a response.

Good cause exists for the extension. The parties parties have reached a settlement and are continuing efforts to finalize the settlement terms; however, it has taken longer than the parties ancitipated to finalize the settlement documents and to obtain signatures from all parties. Further, in light of the upcoming holidays, the parties believe that additional time is necessary to finalize the settlement. Thus, the parties need additional time to finalize the settlement without incurring unnecessary litigation fees and costs.

The parties have entered into this agreement in good faith and not for purposes of delay. This is the parties' way of accommodating one another given the overall increase in litigation in this area of law.

DATED this 21st day of December, 2017. LIPSON, NEILSON, COLE, SELTZER & GARIN, P.C.

DATED this 21<sup>st</sup> day of December, 2017. AKERMAN, LLP

# /s/ Amber M. Williams

Kaleb D. Anderson, Esq. (Bar No. 7582) Amber M. Williams, Esq. (Bar No. 12301) 9900 Covington Cross Drive, Suite 120 Las Vegas, Nevada 89144

Attorneys for Defendant Woodchase Condominiums HOA

## /s/ Scott R. Lachman

Melanie D. Morgan, Esq. (Bar No. 8215) Scott R. Lachman, Esq. (Bar No. 12016) 1160 Town Center Drive, Suite 330 Las Vegas, Nevada 89144

Attorneys for Plaintiff Bank of America, N.A.

ORDER

IT IS SO ORDERED.

umber 27, 2017

UNITED STATES MAGISTRATE JUDGE

-2-

26 27

28